

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

[2] JULIO M. HERRERA-VELUTINI,

Defendant.

CRIMINAL NO. 22-342 (SCC)

MOTION FOR LEAVE TO FILE REPLY

Defendant Julio M. Herrera-Velutini (“Mr. Herrera”), by and through the undersigned attorneys, respectfully moves this Court for leave to file a reply in further support of its Motion to Compel, at Docket No. 438.

On January 10, 2024, the Government submitted the Response to Mr. Herrera’s Motion to Compel. Docket No. 447. A reply is warranted here to respond to the Government’s arguments, in particular to address: 1) the factual inaccuracies, 2) joint collaboration between the Government and local and federal agencies; 3) lack of specificity as to the materiality of the documents requested; and 4) the continue delay in the production and the prejudice it has caused to Mr. Herrera.

Therefore, Mr. Herrera respectfully requests leave to file the Reply brief attached to this Motion as Exhibit A.

Date: January 15, 2024.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this same date, the undersigned attorney filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel for all parties in this action.

Date: January 15, 2024

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